

May 31, 2024

**VIA ECF**

The Honorable Ann M. Donnelly  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Huawei Technologies Co. Ltd.*, No. 1:18-cr-00457 (S-3) (AMD)  
(CLP)

Dear Judge Donnelly:

We submit this application jointly on behalf of the parties to request a two-week extension to the schedule for briefing on the Defendants’ motions pertaining to the protective order and the Bureau of Industry and Security (“BIS”) license.

At the April 4 status conference, the Court entered a schedule for pretrial discovery and briefing. Dkt. 417, 418. Under that schedule, Defendants are due to file contemplated motions concerning the protective order and/or BIS licenses on or before May 31, 2024. Prior to and since the April 4 status conference, the parties have been diligently meeting and conferring to try to narrow the issues for the Court to resolve. The parties respectfully submit that an additional two week extension of the May 31 motions deadline (and corresponding extensions to the government’s opposition and defense reply deadlines) will allow the parties to finalize any agreements and fully ripen any remaining areas of dispute. The parties do not by this application seek the modification of any other pretrial deadlines. Accordingly, the parties request a modification of the pre-trial schedule as follows:

Filing	Current Deadline	Proposed Deadline
Motion(s) concerning protective order and/or Bureau of Industry and Security (“BIS”) licenses	May 31, 2024	June 14, 2024
Government response re: protective order and/or BIS licenses	July 1, 2024	July 15, 2024
Defense reply re: protective order and/or BIS licenses	July 15, 2024	July 29, 2024

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Respectfully submitted,

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CC: Clerk of the Court (AMD) (by ECF)